

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	)	
ASHOT EGIАЗARYAN,	)	
	)	
Plaintiff,	)	Civ. Action No.
	)	
-against-	)	11 CIV 2670
	)	(PKC) (GWG)
PETER ZALMAYEV,	)	
	)	
Defendant.	)	
-----X	)	

Tuesday, March 20, 2012

- - -

Videotape Deposition of RINAT R.

AKHMETSHIN held in the offices of Greenberg  
Traurig, 2101 L Street, Northwest, Washington,  
D.C. 20037 commencing at approximately 10:11 a.m.,  
on the above date, before Cindy L. Sebo,  
Registered Merit Reporter, Certified Real-Time  
Reporter, Certified Shorthand Reporter, Registered  
Professional Reporter, Certified Court Reporter,  
Real-Time Systems Administrator and Notary Public.

HUDSON REPORTING & VIDEO

1-800-310-1769

1 RINAT R. AKHMETSHIN

2 I don't remember. Yes, but I started working  
3 on the Egiazaryan project, correct.

4 Q. Do you recall generally when  
5 that was?

6 A. I think it was around the new  
7 year. So it might have been, like, end of  
8 2010, early 2011. But I think it was 2011 --

9 Q. How did -- how did --

10 A. -- I do not remember exactly.

11 Q. How did that project come about?

12 A. It was very old client of mine  
13 asked me to look into this issue.

14 Q. Who is that?

15 A. His name is Andrey Vavilov.

16 Andrey, A-N-D-R-E-Y, Andrey; last name is  
17 Vavilov, V-A-V-I-L-O-V, Vavilov.

18 Q. Who is Andrey Vavilov?

19 A. Andrey Vavilov is a, I would say,  
20 personal friend of mine and also a  
21 long-standing client.

22 Q. Where does he reside?

23 A. He resides in New York and in  
24 Monaco, as far as I'm concerned -- or as far  
25 as I know. And I know he has a residence in

1 RINAT R. AKHMETSHIN

2 stay in the United States and get political  
3 asylum. And he was really, I would say,  
4 disgusted by this.

5 Q. Did he ask you to do something?

6 A. He asked me what could be done to  
7 tell the American authorities who -- and  
8 American public, first of all, who  
9 Ashot Егиазарян is.

10 Q. Did you then continue to work on  
11 this project?

12 A. I discussed this matter with  
13 Mr. Vavilov extensively.

14 Q. And did he -- did you ever enter  
15 into an agreement with him?

16 A. Yes, I was engaged by  
17 Mr. Vavilov.

18 Q. Was there a written engagement  
19 between you and Mr. Vavilov?

20 A. Rarely. Since we know each other  
21 for such a long time, it's -- I don't think  
22 I've ever had a contract with him or anything  
23 to that matter.

24 I might have years ago, but from  
25 now on, it's just kind of he asked me to do

1 RINAT R. AKHMETSHIN

2 something and I did it for him.

3 Q. And what were the terms by which  
4 you agreed to work on a project relating to  
5 Mr. Egiazaryan for him?

6 A. What do you mean "terms"?

7 Q. Were you getting paid?

8 A. I was paid, correct, yes.

9 Q. Did you -- at the time when you  
10 first met, did you agree on an amount?

11 A. You know, he -- he had some cash  
12 around the house, actually. He said that,  
13 you know, just so on, so on and so on. I --  
14 I think he got some -- I don't remember.

15 He -- he -- he said that, you  
16 know, just I got a cash for something,  
17 someone owed him money or something like  
18 that. I don't remember.

19 But I remember there was money  
20 in, like, hundred-dollar bills bags. And,  
21 you know, he said that, you know, just -- I  
22 mean, he said, I would like to -- you to  
23 start this public awareness project in the  
24 United States, and he thought how much -- and  
25 asked me how much would it cost.

1 RINAT R. AKHMETSHIN

2 Q. What did you say?

3 A. I said that, you know, we could  
4 try, you know. I don't know how far it could  
5 go, but, you know, I think that we could try  
6 and maybe start with \$100,000.

7 Q. Did he give you \$100,000 cash  
8 right --

9 A. He did not have --

10 Q. -- then and there?

11 A. -- he did not have \$100,000, but  
12 I think he had something like 70 or something  
13 like that, 70 or 80. I don't remember.

14 Q. Did he give you \$70,000 cash at  
15 that time?

16 A. Cash, correct, yes.  
17 I don't remember. 70 or 80,  
18 something like that.

19 Q. Is -- is he a Russian citizen --

20 A. Mr. Vavilov?

21 Q. -- Mr. Vavilov?

22 A. I do believe so, yes.

23 Q. Did you ever register under the  
24 Foreign Agents Registration Act with regard  
25 to this project?

1 RINAT R. AKHMETSHIN

2 Mr. Vavilov is a private citizen,  
3 and he lives in the United States, resident  
4 of the United States and resident of Russia.  
5 So there's absolutely no FARA affiliation.

6 Q. Do you know where Mr. Vavilov  
7 got the cash from?

8 A. I don't know. You should ask  
9 him.

10 Q. Did Mr. Vavilov say whether  
11 there were other individuals or entities who  
12 were participating with him in initiating  
13 this project against Ashot Egiazaryan?

14 MR. SPERDUTO: Objection to the  
15 form.

16 THE WITNESS: Mr. Vavilov hates  
17 your client's guts. You know, he  
18 doesn't need any organizations. He  
19 hates him for --

20 BY MR. COHEN:

21 Q. Did he say --

22 A. -- a dozen years.

23 Q. -- did he say whether he was  
24 cooperating with anybody else?

25 A. I don't think so.

1 RINAT R. AKHMETSHIN

2 Peter Zalmayev?

3 A. Because he -- he's a very  
4 thorough researcher himself, and I asked  
5 for his help in being -- doing this matter.

6 Q. Did you tell him you were going  
7 to pay him?

8 A. Yes, I did.

9 Q. Did you tell him who you were  
10 being paid by?

11 A. I did, yes.

12 Q. What did you tell him?

13 A. I said that -- and he was aware  
14 of Andrey Vavilov. I think he met him  
15 before, too. I said it was Mr. Vavilov, yes.

16 Q. Mr. Zalmayev knew from the  
17 outset -- outset that Mr. Vavilov was  
18 financing this assignment; is that correct?

19 A. That is correct, yes.

20 Q. Did you tell Mr. Zalmayev what  
21 his compensation would be for work on the  
22 project?

23 A. You know, I thought Mr. Zalmayev  
24 could do this project on his own. So I  
25 actually was not really planning on doing it

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1 RINAT R. AKHMETSHIN  
 2 A. It might have been one of my  
 3 summaries.  
 4 THE COURT REPORTER: Sorry?  
 5 Summaries?  
 6 THE WITNESS: It might have  
 7 been one of my summaries.  
 8 BY MR. COHEN:  
 9 Q. One of your summaries?  
 10 A. Correct, yes.  
 11 Q. Do you recall when this summary  
 12 was prepared?  
 13 A. Probably in 2009 when I was  
 14 working on this previous matter.  
 15 Q. And in 2009, your goal was to  
 16 find out anything negative you could find  
 17 out about Mr. Egiazaryan; is that correct?  
 18 A. It was an opposition research,  
 19 I'll describe it that way.  
 20 Q. Okay. Well, you were looking  
 21 for information that would paint  
 22 Mr. Egiazaryan in a bad light; is that  
 23 correct?  
 24 A. I would not put it that way, sir.  
 25 Q. How would you put it?

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1 RINAT R. AKHMETSHIN  
 2 A. I would like to do full duties of  
 3 Mr. Egiazaryan's political and other  
 4 activities.  
 5 Q. Do you believe that this is a --  
 6 is this an attempt at a neutral summary of  
 7 Mr. Egiazaryan's life?  
 8 A. I would say yes. You know, I  
 9 just -- I -- I need to review this, sir. I  
 10 haven't seen it in a long time, yes.  
 11 Q. And in --  
 12 A. But I would -- I would -- I would  
 13 say it's just probably very fair description  
 14 of his persona.  
 15 Q. If you had seen something prior  
 16 to this time that described him as  
 17 anti-Semitic, you would have included that  
 18 in here; is that correct?  
 19 MR. SPERDUTO: Objection to the  
 20 form; hypothetical.  
 21 THE WITNESS: I -- at -- at  
 22 that time, I hadn't -- you know, it  
 23 crossed my mind that this LDPR, which  
 24 is deplorable, that truly disgusting  
 25 organization -- but at that time --

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1 RINAT R. AKHMETSHIN  
 2 BY MR. COHEN:  
 3 Q. Just an -- answer my question,  
 4 please, if you had seen something --  
 5 A. I would have included this.  
 6 Q. -- if you had seen -- if you had  
 7 seen something that -- that characterized  
 8 Mr. Egiazaryan or you believed characterized  
 9 him as anti-American, you would have  
 10 included that in here --  
 11 MR. SPERDUTO: Same  
 12 objection --  
 13 BY MR. COHEN:  
 14 Q. -- is that correct?  
 15 MR. SPERDUTO: Same objection.  
 16 BY MR. COHEN:  
 17 Q. That's a yes, right?  
 18 A. If I -- if I would have -- if I  
 19 would had information which reflected that, I  
 20 might have included it.  
 21 Q. If you had information that  
 22 reflected that Mr. Egiazaryan was xenophobic  
 23 or had taken xenophobic actions or made  
 24 xenophobic statements, you would have  
 25 included that; is that correct?

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1 RINAT R. AKHMETSHIN  
 2 MR. SPERDUTO: Same objection.  
 3 THE WITNESS: It's  
 4 argumentative. But I -- if I would  
 5 have established something at that  
 6 time, I would have probably included  
 7 that as well --  
 8 BY MR. COHEN:  
 9 Q. As -- as --  
 10 A. -- because I, personally, feel  
 11 strongly about those things.  
 12 Q. If you had established at that  
 13 time that Mr. Egiazaryan had committed war  
 14 crimes, you would have included that; is  
 15 that correct?  
 16 MR. SPERDUTO: Same objection.  
 17 THE WITNESS: I'm not sure  
 18 about war crimes, sir --  
 19 BY MR. COHEN:  
 20 Q. Okay.  
 21 A. -- he was -- and I -- I'm not  
 22 aware of Mr. Egiazaryan's military service  
 23 ever.  
 24 Q. If you had established at that  
 25 time that Mr. Egiazaryan had embezzled

30 (Pages 114 to 117)



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1 RINAT R. AKHMETSHIN  
 2 Government funds, you would have included  
 3 that; is that correct?  
 4 MR. SPERDUTO: Same objection.  
 5 THE WITNESS: Sir, just  
 6 what-if, you know, I just -- if I  
 7 would have found something which was  
 8 relevant to his case, I would have  
 9 definitely included it.  
 10 BY MR. COHEN:  
 11 Q. At the time that you prepared  
 12 this document that's Exhibit -- marked as  
 13 Exhibit 1 -- Number 162, did you have any  
 14 information or evidence that Mr. Egiazaryan  
 15 was anti-Semitic?  
 16 A. I do not recall that.  
 17 Q. And at that time that you  
 18 prepared this document that's been marked as  
 19 Exhibit 162, did you have any evidence or  
 20 information that Mr. Egiazaryan had taken  
 21 anti-American actions or made anti-American  
 22 statements?  
 23 A. I was not aware of that.  
 24 Q. At the time you prepared this  
 25 document that's been marked as Exhibit 162,

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1 RINAT R. AKHMETSHIN  
 2 did you have any information or evidence  
 3 suggesting that Mr. Egiazaryan had made  
 4 xenophobic statements or taken xenophobic  
 5 actions?  
 6 A. I was not aware of such  
 7 statements --  
 8 Q. At the --  
 9 A. -- or actions.  
 10 Q. -- at the time you prepared this  
 11 document, Number 162, had you -- did you  
 12 have any information or evidence in your  
 13 possession that Mr. Egiazaryan had committed  
 14 war crimes?  
 15 A. I was not aware of those.  
 16 Q. At the time you made -- prepared  
 17 the summary that's contained in Exhibit 162,  
 18 did you have any information or evidence  
 19 that Mr. Egiazaryan had stolen Chechnya war  
 20 relief funds?  
 21 A. I think there's something here if  
 22 you read it carefully, but there was a  
 23 paragraph here about his involvement in  
 24 Chechnya matters.  
 25 Q. And this -- this memo would

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1 RINAT R. AKHMETSHIN  
 2 contain whatever information you collected  
 3 on that information; is that correct?  
 4 MR. SPERDUTO: Objection to the  
 5 form.  
 6 THE WITNESS: I wouldn't --  
 7 sir, this memo is reflecting what I  
 8 knew at that time --  
 9 BY MR. COHEN:  
 10 Q. This memo --  
 11 A. -- reflects --  
 12 Q. -- reflects what you knew at  
 13 that time?  
 14 A. In summaries, yes.  
 15 Q. Yes, thank you.  
 16 And calling your attention to the  
 17 top of the page in your e-mail to  
 18 Mr. Zalmayev, you say you need a one-pager  
 19 pitch for the project?  
 20 A. Yes.  
 21 Q. Well, what did -- what are you  
 22 referring to by that?  
 23 A. I wanted to write a summary for  
 24 Mr. Vavilov and for -- for -- relating to our  
 25 discussion.

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1 RINAT R. AKHMETSHIN  
 2 Q. And -- and I see you have put in  
 3 all caps that -- that you want this relating  
 4 to OLD Chechen structures and OLD Russian  
 5 Government.  
 6 Why did you emphasize the OLD  
 7 governments?  
 8 A. I also emphasize NGOs. That just  
 9 might have been things that --  
 10 THE COURT REPORTER: I'm sorry?  
 11 THE WITNESS: I emphasized  
 12 NGOs. I also put in caps.  
 13 BY MR. COHEN:  
 14 Q. Those are initials. But then,  
 15 later, you emphasize old.  
 16 Why did you emphasize old?  
 17 A. I don't think it was an emphasis,  
 18 sir.  
 19 Q. Is there any reason why you  
 20 didn't want Mr. Zalmayev to investigate  
 21 issues relating to the then current Russian  
 22 Government?  
 23 A. I have no reasons to believe so.  
 24 I want him to do the --  
 25 Q. Can you ex --

31 (Pages 118 to 121)

1 RINAT R. AKHMETSHIN

2 BY MR. COHEN:

3 Q. Do you know Ruben Markarian?

4 A. Oh, yes, yes. That's Ruben.

5 Q. Who -- who is that?

6 A. He is -- he's an attorney for a  
7 person whom Mr. Egiazaryan defrauded for  
8 large amounts of money. Ruben Markarian.  
9 Ruben Markarian.

10 Q. And is that an issue that you've  
11 personally investigated, a dispute between  
12 Mr. Markarian's client and Mr. Egiazaryan?

13 A. Oh, we definitely looked into  
14 this, sir. I did not personally investigate,  
15 but I think that we did everything -- we did  
16 very thorough due diligence.

17 And, actually, I would like to  
18 point out to the exhibit --

19 Q. Just -- let's just -- if you  
20 could just answer my questions.

21 A. I -- I -- we did investigate all  
22 aspects of Mr. Egiazaryan's activities, yes.

23 Q. Calling your attention to the  
24 next page of the expense report.

25 A. Okay.

1 RINAT R. AKHMETSHIN

2 A. What do you mean "coordinate"?

3 Q. Worked with to develop  
4 information or strategy.

5 A. We did do very thorough due  
6 diligence.

7 If I might point out to this  
8 Document Number 163 --

9 Q. I -- no. I'm asking you who --  
10 who else --

11 A. I just like -- sir, I would  
12 like -- can I please make my point?

13 Q. I -- I -- I'd like you to answer  
14 my question --

15 A. Yes, sir.

16 Q. -- about the name --

17 MR. SPERDUTO: I think this is  
18 his answer --

19 THE WITNESS: It's my answer --

20 MR. SPERDUTO: -- let him  
21 answer.

22 THE WITNESS: -- so we did  
23 this -- we made sure that everything  
24 that was said in this project  
25 reflected facts, not allegations.

1 RINAT R. AKHMETSHIN

2 So, therefore, we conducted very  
3 thorough due diligence.

4 And we interviewed, I think --  
5 I, personally, interviewed some  
6 people. Mr. Zalmayev went to Russia  
7 to talk to countless number of people  
8 to establish facts, interviewing  
9 people, doing research online,  
10 doing -- gathering documents. And  
11 there are many people who were  
12 interviewed on this matter, yes, sir.

13 BY MR. COHEN:

14 Q. Did you interview  
15 Mr. Egiazaryan?

16 A. No. We couldn't get him.

17 Q. Did you -- did you, personally,  
18 reach out to him?

19 A. I do not remember that effort,  
20 sir.

21 Q. Did you speak with  
22 Mr. Egiazaryan's representatives?

23 A. I do not remember, sir. I --

24 Q. Do --

25 A. -- personally, did not.

1 RINAT R. AKHMETSHIN

2 Q. Do you recall, did you,  
3 personally, reach out to Mr. Egiazaryan's  
4 representatives?

5 A. I did not.

6 Q. Back to my earlier question,  
7 were -- you -- other than people whom you  
8 interviewed with -- interviewed, was there  
9 anyone who you collaborated with to develop  
10 a strategy or approach?

11 A. We did talk to people who were a  
12 victim of Mr. Egiazaryan's actions, and we  
13 did try to find out from them their stories.  
14 And we tried to utilize them if -- to the  
15 extent they were applicable to our effort.

16 Q. Do you recall who you spoke  
17 with?

18 A. On what -- on what matter, sir?

19 Q. Excuse me?

20 A. On what matter, sir?

21 Q. Relating to Mr. Egiazaryan.

22 A. I spoke with many people.

23 Q. Who did you speak to?

24 A. Many people. I do not remember  
25 the names. I met with people in Russia. I

1 RINAT R. AKHMETSHIN

2 met with people in Washington, D.C. on these  
3 matters.

4 Q. Is there anyone who stands out  
5 who you spoke to whose name you can recall?

6 MR. SPERDUTO: Objection to the  
7 form; ambiguous; asked and answered.

8 I assume you mean in addition  
9 to everybody he's already talked  
10 about?

11 BY MR. COHEN:

12 Q. Can you identify the names of  
13 individual witnesses who you spoke to?

14 A. Mr. Markarian is probably the  
15 most helpful person on this matter.

16 Q. Okay. Anybody else other than  
17 Mr. Markarian who comes to mind?

18 A. He introduced us to many people,  
19 actually, who were victims of Mr. Egiazaryan.

20 Q. And Mark- -- and Mr. Markarian  
21 is an adversary of Mr. Egiazaryan's?

22 A. I think he's -- I think he's a  
23 lawyer for a person who was a victim of  
24 Mr. Egiazaryan's laundering.

25 Q. And -- and any -- is there

1 RINAT R. AKHMETSHIN

2 anyone else who you can recall speaking  
3 with?

4 A. I don't remember. He introduced  
5 us to many people, to journalists.

6 Q. Do you recall if you spoke with  
7 anyone who either did not have -- who did  
8 not have a dispute with Mr. Egiazaryan or  
9 did not represent someone who had a dispute  
10 with Ms. -- Mr. Egiazaryan?

11 A. I spoke to journalists who were  
12 just in general covering this issue.

13 Q. So journalists and -- you spoke  
14 with journalists; you spoke with people who  
15 are in a dispute or represented people with  
16 a dispute with Mr. Egiazaryan.

17 Anybody else?

18 A. That's pretty much people who  
19 could be helpful on this project.

20 Q. Did you speak with  
21 Suleiman Kerimov?

22 A. No, I did not.

23 Q. Do you know who he is?

24 A. I heard of him. He's a rich man.

25 Q. Did you speak with any

1 RINAT R. AKHMETSHIN

2 Q. And -- and you're trying to  
3 persuade them to focus on the asylum matter?

4 A. To the effect which -- to the  
5 extent which they could have focused on this  
6 thing. I wish they did, but they -- they had  
7 their own interests.

8 Q. And -- and have you seen -- you  
9 mentioned to a message of hatred in Russia?

10 A. I have seen message of hatred  
11 being propagated by LDPR.

12 Q. Have you seen Mr. Egiazaryan  
13 making any personal statements that reflect  
14 the message of hatred?

15 A. I have seen Mr. Egiazaryan being  
16 an associate of this party and --

17 Q. Have you seen --

18 A. -- serving on their --

19 Q. -- okay. I'll ask you the  
20 question again.

21 Have you seen Mr. Egiazaryan --  
22 any statements from Mr. Egiazaryan expressing  
23 hatred for anyone?

24 A. I haven't seen many statements  
25 with Mr. Egiazaryan because I do not believe



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2 he was a politician, per se. But he was a  
3 supporter. That's why I very carefully said  
4 about support of this message, because he  
5 lended his name to that message.

6 Q. Did you ever see him -- any  
7 statements from him -- any anti-Semitic  
8 statements from Mr. Egiazaryan?

9 A. I don't have seen any statements  
10 from Mr. Egiazaryan, except for him being a  
11 member -- or an associate of that party.

12 Q. Have you seen any statements  
13 from him supporting any positions of the  
14 LDPR?

15 A. No, but by his -- I saw him  
16 supporting LDPR by lending them their name --  
17 his own personal name, which is -- I think  
18 it's quite significant, in my view.

19 Q. Did you see any -- any  
20 position -- any statement by Mr. Egiazaryan  
21 in favor of any position of the LDPR that  
22 you find reprehensible or inappropriate?

23 A. I think him being serving on the  
24 list of that party within Russian Duma,  
25 whereas he could have joined any of the

1 RINAT R. AKHMETSHIN

2 exchange of information has stopped by the  
3 time when we realized that, you know, just  
4 there's nothing else to discuss or compare.

5 Q. Your issue -- was your issue to  
6 have Mr. Egiazaryan deported?

7 A. No. My issue, as my client asked  
8 me to do, to not -- to allow my client not to  
9 see Mr. Egiazaryan in the United States. I  
10 will put it that way.

11 Q. Did you participate in the  
12 securing of letters from Lev Ponomarev and  
13 Lyudmila Alexeyeva?

14 A. I did not. I do not know.

15 Q. Did you play any role in the  
16 drafting of those letters?

17 A. I might have seen some -- I'm not  
18 sure, sir. No, I --

19 Q. Did you --

20 A. -- the answer probably is no. I  
21 do not remember.

22 Q. You don't remember or you did  
23 not?

24 A. I do not remember, sir.

25 Q. Did you play a role in drafting

1 RINAT R. AKHMETSHIN

2 THE WITNESS: Thank you.

3 BY MR. COHEN:

4 Q. Is this an e-mail from you to  
5 Mr. Zalmayev -- I'm sorry -- from  
6 Mr. Zalmayev to you?

7 A. It does appear that way, sir,  
8 yes.

9 Q. And it's dated February 9th,  
10 2011?

11 A. Correct.

12 Q. You received this e-mail on  
13 around February 9th, 2011?

14 A. That's what it states, yes.

15 Q. And I'll call your attention to  
16 the bottom.

17 And it says, the Chechnya thing  
18 event -- evidently backfired on us --

19 A. Correct.

20 Q. -- do you see that?

21 A. Yes, I see that, sir.

22 Q. What did you understand  
23 Mr. Zalmayev to mean by that?

24 A. I do not know, sir. I think that  
25 he probably refers to the fact that, you

1 RINAT R. AKHMETSHIN

2 know, there's research on Chechen matter. We  
3 couldn't find any credible information.

4 And I think that was the time  
5 when discussion of Mr. Egiazaryan's Chechen  
6 record was suspended, because we couldn't say  
7 with certainty about his Chechen activity.  
8 We're very careful to say only facts.

9 Q. And -- and the information  
10 regarding what happened in Chechnya was  
11 murky at best; is that correct?

12 MR. SPERDUTO: I'm sorry.

13 The -- the information -- can you  
14 read it back? I beg your pardon.

15 MR. COHEN: I -- I'll -- I'll  
16 say it -- I'll ask the question  
17 again.

18 Just give me a second.

19 (Pause.)

20 MR. COHEN: All right. Can we  
21 take a few-minute break?

22 THE WITNESS: Absolutely.

23 MR. COHEN: Thank you.

24 THE VIDEOGRAPHER: The time is  
25 4:37. We're going off the record.

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1 RINAT R. AKHMETSHIN  
 2 for that question whatsoever.  
 3 THE WITNESS: I'm not aware of  
 4 any such efforts, sir.  
 5 MR. GOLDEN: Jason, can we go  
 6 off the record a second?  
 7 MR. COHEN: Yes.  
 8 MR. GOLDEN: I have --  
 9 THE VIDEOGRAPHER: Hold on.  
 10 The time is 5:57. We're going  
 11 off the record.  
 12 (Whereupon, a discussion was  
 13 held off the record.)  
 14 THE VIDEOGRAPHER: The time is  
 15 6:12 p.m. We are back on the record.  
 16 MR. COHEN: I'll ask the court  
 17 reporter to mark as Exhibit 202 a  
 18 copy of a document from  
 19 Rinat Akhmetshin to -- or an e-mail  
 20 from Rinat Akhmetshin to  
 21 Peter Zalmayev.  
 22 ---  
 23 (Whereupon, an e-mail with  
 24 attachment was marked, for  
 25 identification purposes, as Deposition

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1 RINAT R. AKHMETSHIN  
 2 Exhibit Number 202.)  
 3 ---  
 4 BY MR. COHEN:  
 5 Q. Have you seen this document  
 6 before?  
 7 A. I have, sir, yes.  
 8 Q. Did you send this e-mail to  
 9 Peter Zalmayev on May 24th, 2011?  
 10 A. It does -- it does appear that  
 11 way, yes, sir.  
 12 Q. What was the purpose of this  
 13 e-mail?  
 14 A. It's actually a summary of  
 15 Russian media publications about  
 16 Mr. Egiazaryan.  
 17 Q. Why was it prepared?  
 18 A. Because we wanted to make sure  
 19 that we are covering comprehensively this --  
 20 Mr. Egiazaryan's track record.  
 21 Q. And -- and how -- who -- did you  
 22 contract someone --  
 23 A. I did.  
 24 Q. -- to do some research for you?  
 25 A. Yeah, I did, sir, yes.

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1 RINAT R. AKHMETSHIN  
 2 Q. Who did you contract?  
 3 A. There's someone in Russia, just I  
 4 don't remember now. I -- I should go back,  
 5 but that's someone who was recommended to me  
 6 and that -- I think it's an organization,  
 7 some media organization, and -- but I did pay  
 8 for it.  
 9 Q. How much did you pay?  
 10 A. I think, like, \$3,000.  
 11 Q. And it's supposed to be a  
 12 comprehensive survey of research regarding  
 13 Mr. Egiazaryan?  
 14 A. I think so. There should be some  
 15 methodology how this research was conducted.  
 16 There it says, neutral, positive,  
 17 negative.  
 18 Q. Did you read this entire  
 19 document?  
 20 A. Not exactly, to be honest.  
 21 Q. Were you made aware by this  
 22 document of any anti-Semitic or  
 23 anti-American statements by Mr. Egiazaryan  
 24 or attributed to him?  
 25 A. I think there's something here

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1 RINAT R. AKHMETSHIN  
 2 with him. There might have been.  
 3 I -- I do not -- to be honest,  
 4 it's been a long time since I got this. I  
 5 can --  
 6 MR. SPERDUTO: You're not  
 7 asking him to read this --  
 8 MR. COHEN: No, I'm not. I'm  
 9 asking him if he recalls any specific  
 10 anti-Semitic or anti-American  
 11 statements made by Mr. Egiazaryan or  
 12 attributed to him --  
 13 THE WITNESS: I think --  
 14 MR. COHEN: -- on this  
 15 document.  
 16 THE WITNESS: -- there's  
 17 something about anti-Semitic stuff.  
 18 It says that Ashot Egiazaryan in  
 19 Russian media history of scandals.  
 20 So --  
 21 BY MR. COHEN:  
 22 Q. I'm sorry. I didn't hear the  
 23 answer.  
 24 A. It's -- I -- I -- I do not  
 25 remember, sir. I could -- if you want me to,

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1 RINAT R. AKHMETSHIN  
 2 I could review this document.  
 3 Q. No.  
 4 A. But I'm sure there was some stuff  
 5 here about anti-Semitism.  
 6 Q. And -- and this is exclusively  
 7 from newspaper articles; is that correct?  
 8 A. It says smee (phonetic). Smee in  
 9 Russia is like media, so it could be articles  
 10 and online newspapers.  
 11 Q. It could be blogs?  
 12 A. I think that at that time, it  
 13 could have been, yes. I'm not sure.  
 14 So there are a lot of articles  
 15 here from Novaya Gazeta. Everything is in  
 16 the public record. Let's put it that way.  
 17 Q. And if you had a specific  
 18 statement of an anti-Semitic or  
 19 anti-America -- a specific instance of an  
 20 anti-American or anti-Semitic statement, you  
 21 would have used it in your educational  
 22 efforts; is that correct?  
 23 A. I think we had enough for  
 24 education efforts, sir.  
 25 Q. Do you recall ever notifying any

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1 RINAT R. AKHMETSHIN  
 2 journalist or anybody of any specific  
 3 anti-American or anti-Semitic statements by  
 4 Mr. Egiazaryan?  
 5 A. His presence on the party list of  
 6 LDPR was enough reason for us, sir --  
 7 Q. And that was --  
 8 A. -- I -- there might have been  
 9 some articles. I do not recall, sir.  
 10 Q. You don't recall, one way or  
 11 another, whether there was any articles of  
 12 anything other than an -- an -- an alleged  
 13 affiliation with the LDPR --  
 14 MR. SPERDUTO: Well, Jason --  
 15 BY MR. COHEN:  
 16 Q. -- is that correct?  
 17 MR. SPERDUTO: -- just -- just  
 18 a minute, please.  
 19 You're asking him about a  
 20 document that has 28 pages. It's  
 21 over -- what's that? -- seven or  
 22 eight months old.  
 23 And you're asking him if he can  
 24 recall what's in the document or is  
 25 it in the document?

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1 RINAT R. AKHMETSHIN  
 2 Flip through and see if you  
 3 find anything.  
 4 THE WITNESS: There's this  
 5 whole Chapter 14. It's about  
 6 anti-Semitic links of the LDPR.  
 7 BY MR. COHEN:  
 8 Q. All right. The last question  
 9 that I asked was, if you had any specific  
 10 instance of an anti-American or anti-Semitic  
 11 statement, you would have included that in  
 12 -- in writing; is that correct?  
 13 MR. SPERDUTO: Hypothetical;  
 14 improper.  
 15 THE WITNESS: I think we  
 16 included what we knew for the best of  
 17 our knowledge, sir.  
 18 BY MR. COHEN:  
 19 Q. You included what you knew from  
 20 the best of your knowledge; is that correct?  
 21 A. I think whatever was  
 22 communicated, that was the stuff which was  
 23 based on due diligence. And if we have  
 24 referred to something, it has -- it must have  
 25 been sourced to something. That's -- that's

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1 RINAT R. AKHMETSHIN  
 2 a fair thing to say. So we try to be very  
 3 fair.  
 4 Q. And if you found -- strike that.  
 5 Are you aware, in any of the  
 6 letters or materials that were prepared by  
 7 Mr. Zalmayev or by you, of any specific  
 8 anti-Semitic or anti-American statement by  
 9 Mr. Egiazaryan?  
 10 A. I think that -- I do not recall,  
 11 sir, one way or another -- I do not recall  
 12 one way or another, sir.  
 13 Q. I'm going to show you PZ2292,  
 14 which we'll mark as Exhibit 203.  
 15 ---  
 16 (Whereupon, an e-mail was  
 17 marked, for identification purposes, as  
 18 Deposition Exhibit Number 203.)  
 19 ---  
 20 MR. COHEN: I'm sorry. This  
 21 one.  
 22 BY MR. COHEN:  
 23 Q. Have you seen this document  
 24 before?  
 25 A. I do not recall, sir. I don't

90 (Pages 354 to 357)

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1 RINAT R. AKHMETSHIN  
2 believe so.  
3 MR. COHEN: I'm going to mark  
4 as Exhibit 204, PZ2911.

5 ---  
6 (Whereupon, an e-mail with  
7 attachment was marked, for  
8 identification purposes, as Deposition  
9 Exhibit Number 204.)

10 ---  
11 THE WITNESS: Thank you.  
12 BY MR. COHEN:

13 Q. Have you seen this before?

14 A. Yes.

15 Q. And did -- do you know who  
16 prepared this compilation of materials?

17 A. I don't remember, but these are  
18 compilation of articles.

19 Q. Do you know where you got it  
20 from?

21 A. From Moscow, most likely. I  
22 don't recall exactly.

23 Q. Do you know who -- who sent it  
24 to you?

25 A. Maybe some journalist from Novaya

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1 RINAT R. AKHMETSHIN  
2 Gazata --

3 Q. Was --

4 A. -- these are articles from --  
5 that's a compilation of articles.

6 Q. Was this part of your research  
7 for -- for learning information about  
8 Ashot Egiazaryan?

9 A. I'm sure it was part of it.

10 MR. SPERDUTO: This is 204,  
11 right?

12 THE WITNESS: This is 204, yes.

13 BY MR. COHEN:

14 Q. I'm going to show you what's  
15 been -- what has Bates Number PZ2718.

16 MR. COHEN: And we'll mark that  
17 as Exhibit 205.

18 ---

19 (Whereupon, an e-mail with  
20 attachment was marked, for  
21 identification purposes, as Deposition  
22 Exhibit Number 205.)

23 ---  
24 BY MR. COHEN:

25 Q. What is this?

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1 RINAT R. AKHMETSHIN

2 A. A summary of the articles.

3 Q. And who -- who -- who prepared  
4 it?

5 A. I do not recall. I did receive  
6 it from Russia, most likely, since it's in  
7 Russian.

8 Q. I'm going to show you what  
9 contains Bates Number PZ2781 --

10 ---

11 (Whereupon, Russian document  
12 was marked, for identification  
13 purposes, as Deposition Exhibit  
14 Number 206.)

15 ---

16 THE WITNESS: Thank you.

17 BY MR. COHEN:

18 Q. -- which we'll mark as  
19 Exhibit 206.

20 What is this?

21 A. It's the summaries of articles,  
22 but, you know, I -- I might speculate -- I  
23 cannot say for sure, but these are weekly  
24 summaries of articles about Russian -- it's  
25 not just Mr. Akhmetshin. There are other

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1 RINAT R. AKHMETSHIN  
2 people who are mentioned here.

3 But it might have been from  
4 Mr. Markarian, because it's his client  
5 matter.

6 Q. Well, whose -- what do you mean,  
7 "his client"?

8 A. Europark was something which  
9 Mr. Smagan was -- Mr. Egiazaryan allegedly  
10 stole this property from Mr. Smagan.

11 And if this -- I -- I did not  
12 prepare this statement, but if I did receive  
13 it, it probably was from Mr. Smagan's  
14 lawyers.

15 Q. And you don't have any specific  
16 knowledge regarding or expertise regarding  
17 the dispute between Mr. Egiazaryan and  
18 Mr. Smagan, do you?

19 A. I do not know. It's just stuff,  
20 it's articles.

21 Q. I'll show you what we'll mark as  
22 Exhibit 207, which bears Bates Number 2849.

23 MR. COHEN: I'm sorry. Let  
24 me --

25 ---

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1 RINAT R. AKHMETSHIN  
 2 (Whereupon, an e-mail with  
 3 attachment was marked, for  
 4 identification purposes, as Deposition  
 5 Exhibit Number 207.)  
 6 ---  
 7 THE WITNESS: Thank you.  
 8 BY MR. COHEN:  
 9 Q. Have you seen that before?  
 10 A. I might have, yes.  
 11 Q. Do you know who prepared this?  
 12 MR. SPERDUTO: I'm sorry.  
 13 Which page are you talking about,  
 14 2849 or the subsequent pages?  
 15 MR. COHEN: The subsequent  
 16 pages.  
 17 BY MR. COHEN:  
 18 Q. Do you know who prepared the  
 19 report that's on the subsequent pages?  
 20 A. Summary. It could have been  
 21 Mr. Markarian's people, his law firm.  
 22 Q. You don't recall one way or the  
 23 other?  
 24 A. I -- I most likely -- I did not  
 25 write this. This I could tell for sure.

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1 RINAT R. AKHMETSHIN  
 2 I do remember this document, yes.  
 3 Q. I'm going to show you what we'll  
 4 mark as Exhibit 208.  
 5 ---  
 6 (Whereupon, series of articles  
 7 and papers was marked, for  
 8 identification purposes, as Deposition  
 9 Exhibit Number 208.)  
 10 ---  
 11 BY MR. COHEN:  
 12 Q. Have you seen this before?  
 13 A. I do not remember, sir. But this  
 14 is just articles and papers.  
 15 Q. And who collected that?  
 16 A. It might have been Peter --  
 17 Mr. Zalmayev.  
 18 Q. And are you aware of any other  
 19 than I've -- anything other than what I've  
 20 shown you that constitutes written research  
 21 regarding Mr. Egiazaryan that you've seen?  
 22 A. I do not remember, sir. This  
 23 might -- there might be -- I'm sure there's  
 24 much, much more, because there's a lot of,  
 25 like, rubbish online and, you know, some

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1 RINAT R. AKHMETSHIN  
 2 stuff which is absolutely outrageous.  
 3 But these are articles which we  
 4 probably can see that would be relevant, you  
 5 know, and just --  
 6 Q. Are you aware --  
 7 A. -- reports --  
 8 Q. -- of any other written or  
 9 collected compilations of articles or  
 10 research other than the ones that I've just  
 11 shown you?  
 12 A. I'm not sure, sir.  
 13 Q. You're not aware of anything?  
 14 A. I --  
 15 MR. SPERDUTO: He just talked  
 16 about the online stuff.  
 17 MR. COHEN: I said --  
 18 THE WITNESS: So there are --  
 19 there are -- I -- I compiled -- some  
 20 of the stuff was compiled or I  
 21 commissioned compilation of -- or  
 22 research --  
 23 BY MR. COHEN:  
 24 Q. Right.  
 25 A. -- the stuff.

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1 RINAT R. AKHMETSHIN  
 2 And I read a lot of articles  
 3 myself, but these are stuff which I've  
 4 probably seen before. These are old articles  
 5 which we discussed two, three times in this  
 6 deposition already.  
 7 Q. Do you recall anything else that  
 8 you commissioned or received that contains a  
 9 compilation of media or articles regarding  
 10 Mr. Egiazaryan?  
 11 A. Not to the best of my  
 12 recollection, sir.  
 13 Q. Do you recall any other written  
 14 reports or other information regarding  
 15 Mr. Egiazaryan other than what we've seen in  
 16 this pile of materials that we've discussed?  
 17 A. I think I did -- I did  
 18 commission -- we mentioned it, but I haven't  
 19 seen this among these documents -- I did  
 20 commission a legal memo --  
 21 Q. Okay.  
 22 A. -- on Mr. Egiazaryan's  
 23 immigration matters.  
 24 Q. That's the Snelbecker memo?  
 25 A. Snelbeck- -- Ms. Snelbecker's --

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1 RINAT R. AKHMETSHIN  
 2 Q. Okay --  
 3 A. -- memos.  
 4 Q. -- so anything -- other than the  
 5 Snelbecker memo, was there anything else  
 6 that you can recall that you commissioned  
 7 with regard to providing research or  
 8 materials on Mr. Egiazaryan?  
 9 A. It doesn't come to my memory  
 10 right now, but we've seen quite a few things  
 11 here, sir.  
 12 Q. There's quite a few things that  
 13 seems to be rela- -- does that seem to be  
 14 relatively comprehensive in terms of what  
 15 you recall?  
 16 A. I think that there are probably  
 17 over a thousand pages of serious documents.  
 18 I think it's pretty serious materials.  
 19 Q. I'm going to show you what's  
 20 been previously marked as Exhibit 83.  
 21 Have you seen this document  
 22 before?  
 23 A. Yes, I have, sir.  
 24 Q. What is it?  
 25 A. It's a -- it's a memo from

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1 RINAT R. AKHMETSHIN  
 2 Mr. Bloomfield.  
 3 Q. And then it says -- on the very  
 4 top of the first page, it says --  
 5 A. Memo conference, I guess --  
 6 Memcon --  
 7 Q. -- Memcon, and then it says  
 8 Spoke to Rinat, correct?  
 9 A. Correct, yes.  
 10 Q. And then there's a date of  
 11 February 4th, 2011; is that correct?  
 12 A. Correct, sir, it does appear so.  
 13 I did not write this memo.  
 14 Q. And then I call your attention  
 15 to the -- well, let me just step back for a  
 16 second.  
 17 So there came a time when you  
 18 turned the -- your attention away from  
 19 Chechnya and towards anti-Semitism; is that  
 20 correct?  
 21 A. Correct, because -- yes, correct.  
 22 Q. And -- and did you have numerous  
 23 conversations with Mr. Zalmayev about the  
 24 strength of -- of the argument regarding  
 25 anti-Semitism?

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1 RINAT R. AKHMETSHIN  
 2 A. Could you please --  
 3 Q. Did you have a conversation with  
 4 Mr. Zalmayev as to how strong a case there  
 5 was to allege that -- to allege  
 6 anti-Semitism with regard to Mr. Egiazaryan?  
 7 A. We always -- we discussed this  
 8 issue of anti-Semitism of how strong or how  
 9 weak. We -- we established that Chechnya  
 10 thing was not -- we could not say with  
 11 certainty. So, therefore, we dropped this  
 12 matter and we focused on other matter.  
 13 Q. Did you conclude that you  
 14 couldn't make the anti-Semitism argument  
 15 with certainty?  
 16 A. I don't think so, sir.  
 17 Q. Okay. I'll call your attention  
 18 to Paragraph 17, which is on Page 484.  
 19 And do you see where it says, Not  
 20 an easy issue, largely circumstantial. It's  
 21 the party and its leader, Zhirinovsky?  
 22 A. Yes, I do read this, sir.  
 23 Q. And did you discuss -- does  
 24 that -- was that Mr. Zalmayev's position on  
 25 February 4, 2011?

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1 RINAT R. AKHMETSHIN  
 2 MR. SPERDUTO: I'm sorry. The  
 3 contents of paragraph -- you're  
 4 asking if -- you're asking  
 5 Mr. Akhmetshin if the contents in  
 6 Paragraph 17 in a memo written by  
 7 Mr. Bloomfield is Mr. Zalmayev's  
 8 position?  
 9 MR. COHEN: Yeah, did he  
 10 express that position when -- in a  
 11 conversation on or around  
 12 February 4th, 2011?  
 13 MR. SPERDUTO: On who -- did  
 14 who -- did --  
 15 MR. COHEN: Mr. Zalmayev --  
 16 THE WITNESS: I do not --  
 17 MR. COHEN: -- state --  
 18 BY MR. COHEN:  
 19 Q. Did -- did you hear Mr. Zalmayev  
 20 state with regard to the anti-Semitism  
 21 argument that it's not an easy issue, it's  
 22 largely circumstantial --  
 23 MR. SPERDUTO: There's nothing  
 24 in --  
 25

93 (Pages 366 to 369)

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